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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RES EXHIBIT SERVICES, LLC, a New
York limited liability company;

Plaintiff,

vs.

LNW GAMING, INC. f/k/a SG GAMING,
INC. f/k/a BALLY GAMING, INC., a
Nevada corporation,

Defendant.

LNW GAMING, INC. f/k/a SG GAMING,
INC. f/k/a BALLY GAMING, INC., a
Nevada corporation,

Counterclaimant,

vs.

RES EXHIBIT SERVICES, LLC, a New
York limited liability company; JAMES
LEONARDO, an individual; JERI
WIEDEMER, an individual; and ROBERT
REYES, an individual,

Counterdefendants.

Case No.: 2:21-cv-01953-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES**

(Fourth Request)

STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES**(Fourth Request)**

Pursuant to Local Rule (“LR”) IA 6-1, Plaintiff/Counterdefendant RES Exhibit Services, LLC (“RES”), Defendant/Counterclaimant LNW Gaming, Inc. f/k/a SG Gaming, Inc. f/k/a Bally Gaming, Inc. (“LNW”), Defendant James Leonardo (“Leonardo”), Defendant Jeri Wiedemer (“Wiedemer”) and Defendant Robert Reyes (“Reyes”) (collectively, the “Parties”), by and through their undersigned counsel of record, hereby request and stipulate to a 60-day extension of all discovery deadlines in light of the broad scope of discovery in this case, the recent appearance of counsel, the discovery remaining to be done, scheduling conflicts of the parties and witnesses, and the length of time it has taken to review and produce voluminous amount of documents and electronically stored information (“ESI”) which may be relevant to issues in this matter.

This is the Parties’ fourth request for an extension of time, and the first request to extend the deadlines entered in the Court’s recent Scheduling Order [ECF No. 156]. This request is not intended for delay and is made in good faith.

I. DISCOVERY COMPLETED

1. RES has served its initial disclosures and one (1) supplement thereto;
2. LNW has served its initial disclosures and eight (8) supplements thereto;
3. Wiedemer, Leonardo and Reyes have served their initial disclosures;
4. The Parties have each propounded and responded to written discovery requests and produced the vast majority of responsive documents and ESI in this action.

II. DISCOVERY TO BE COMPLETED

1. The Parties intend to notice and/or issue subpoenas for several party and non-party depositions of witnesses located throughout the United States;
2. The Parties may propound additional written discovery requests;
3. The Parties may disclose expert witnesses and reports pursuant to Fed. R. Civ. P. 26(a)(2); and
4. The Parties may notice the depositions of expert witnesses.

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III. ~~PROPOSED~~ UPDATED DISCOVERY PLAN AND SCHEDULING ORDER

The Court adopted a Discovery Plan and Scheduling Order on January 30, 2025 [ECF No. 156]. For the reasons discussed herein and as suggested by the Court in its March 9, 2025 Minute Order [ECF No. 159], the Parties now propose that the Court adopt the following deadlines:

A. Discovery Cut-Off

The current discovery cut-off date is Tuesday, July 29, 2025. The Parties propose to extend that deadline by 60 days to **Monday, September 29, 2025**.

B. Deadline to Amend Pleadings/Add Parties.

The deadline to amend pleadings/add parties is Wednesday, April 30, 2025. The Parties propose to extend that deadline by 60 days to **Monday, June 30, 2025**.

C. Deadline to Disclose Experts

The current deadline to disclose expert witnesses is Friday, May 30, 2025, and the deadline to disclose rebuttal experts is Sunday, June 29, 2025. The Parties propose to extend the deadline for filing expert disclosures by 60 days to **Tuesday, July 29, 2025**. Rebuttal disclosures shall be made thirty (30) days later on **Thursday, August 28, 2025**.

D. Deadline to File Dispositive Motions

The current dispositive motion deadline is Friday, August 29, 2025. The Parties propose to extend that deadline by 60 days to **Tuesday, October 28, 2025**.

E. Deadline for Joint Pre-Trial Order

Pursuant to LR 26-1(b)(5), the parties shall have until 30 days after the deadline for filing dispositive motion to file the joint pretrial order. Alternatively, if dispositive motions are filed, the Parties will have 30 days after the date that the Court decides any dispositive motions within which to file the joint pretrial order. The deadline to file the joint pretrial order is currently Monday, September 29, 2025. The Parties propose to extend that deadline by 60 days to **Friday, November 28, 2025**. This deadline is suspended if the dispositive motions are timely filed and the joint pretrial order will be due 30 days following disposition of any dispositive motion.

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F. FRCP 26(a)(3) Disclosures

The Parties agree to include their disclosures required by FRCP 26(a)(3) and any objections thereto in the joint pretrial order.

IT IS SO STIPULATED.

DATED this 19th day of March 2025.

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/s/ Chad W. Flansburg

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IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Date: March 19, 2025